



Gateway Pacific Terminal Preliminary Information Document **Comments**

The following preliminary comments are based on our review of the Project Information Document dated February 28, 2011. Whatcom County is provided these comments for the ORA MAP team to provide project specific guidance for the applicant. Whatcom County reserves the right to provide additional comments in the future.

ROADWAY and RAILROAD TRANSPORTATION

Additional/revised information needed:

1. Train crossing impact to intersection of Main St. and Portal Way (Custer, WA).
2. Traffic impact analysis for the intersections of Grandview Rd./Vista Dr. and Birch Bay Lynden/Kickerville Rd.
3. Intersection #7 on fig. 5-13 is now a completed and functioning roundabout.
4. Provide a drawing with the existing and proposed railroad crossing control systems at all county public roads within the Whatcom County road system.
5. It appears that the project site overlay portions of Lonseth Rd. and Powder Plant Rd. Are there plans to pursue vacation of these roads from the County?

Impact mitigation discussion:

1. No new trains during the AM or PM peak hour of adjacent public roads.
2. Add railroad signal/crossing gates to county road crossings that are missing these systems.
3. Creation of Quiet Zone at specific railroad crossings with public county roads.
4. County roads may be blocked by train crossings 2 or more hours on a daily basis. Explore the use of intelligent advance warning systems to inform the traveling public of delays at railroad crossings.
5. Improve the crossing surface between the rail tracks with concrete aprons.

The following section and page number refer to the document's numbering system.

Section 4.3.5 Rail Access

First bullet: Where would the new receive/departure tracks be located in order to accommodate a train that is 8500 ft. long and not block an existing county road/RR crossing?

Section 5.6.1.2, page 5-104

Fourth paragraph: "Table 5-20" should be "Table 5-21".

Last paragraph: "Table 5-21" should be "Table 5-22".

Section 5.6.2.2, page 5-113

Second to last paragraph: "Table 5-20" should be "Table 5-21".

Last paragraph: Intersection 7 is now a roundabout and reference to it should be removed from this sentence.

Section 5.6.2.2, page 5-129

First paragraph: "Table 5-21" should be "Table 5-22".

STORMWATER MANAGEMENT SYSTEMS

Additional information needed:

1. Further discussion and explanation detailing the stormwater facilities.
2. How the different components (sediment-trapping basins, bioswales, water quality mitigation pond) of the stormwater system function.
3. Discuss some of the unique problems and mitigation for stormwater in dealing with the bulk commodities proposed on this site (coal and grain).

NATURAL RESOURCE COMMENTS

- Project does not appear to conform to WCC16.16.260(A) mitigation sequence. Several instances where wetland fill can be avoided or amount of fill area could be reduced such as job shack in wetland, configuration of silo storage area, location of silage storage area, stormwater ponds. More information needs to be submitted to validate alternatives analysis.
- Has wetland ratings been verified by Army Corp and/or Department of Ecology?
- Significant amount of additional mitigation required for wetland fill and wetland/stream buffer impacts. Please review WCC16.16.680 for additional information on County mitigation ratios and requirements.
- The proposed Stormwater pond may not be considered for mitigation credit. Elimination of emergent wetland for the creation of a stormwater pond is an impact and could not be used for mitigation credit. Please provide additional information on the specifics of the storm water pond.

- Can train tracks be elevated on a trestle to eliminate a large amount of wetland fill? This would help to reduce the nearly 3 million cu yd of fill and grade activity proposed.
- Presumed and historic fish usage of Stream 1 and 2 which County code require 100' buffers from such features.
- Some of the wetland creation areas seem to be disconnected from a water and habitat prospective (see wetland creation areas B, C, H, L.F). Off-site or in-lieu mitigation may provide better mitigation opportunities.
- Is creek coming out of proposed stormwater pond to be restored?
- As a first priority for off-site mitigation, consider meeting additional wetland, stream, and buffer mitigation on neighboring properties located within the project's watershed.
- Consider meeting additional wetland, stream, and buffer mitigation needs in the Birch Bay/Terrell Creek watershed.
- Select mitigation sites based on the recommendations in Chapter 7 of the "Birch Bay Watershed Characterization and Planning Pilot Study," ESA Adolfson 2007. Of particular interest for restoration is the Terrell Creek Lower Tributaries (http://www.co.whatcom.wa.us/pds/naturalresources/specialprojects/pdf/Terrell_Ck_Lower_Trib_portfolio.pdf).
- Whatcom County has a GIS inventory of wetland and stream restoration potential that is a result of the Pilot Study. Contact Peter Gill for more information: pgill@co.whatcom.wa.us.
- Use the Birch Bay Watershed Habitat Mitigation Fund (pay fee-in-lieu-of mitigation) for buffer mitigation needs when it comes online in 2011.
- Consider establishing a certified in-lieu-fee mitigation program for remaining impacts that cannot be mitigated onsite or in the Birch Bay Watershed.
- A link to the Pilot Study and more information on the Habitat Mitigation Fund can be found here:
- <http://www.co.whatcom.wa.us/pds/naturalresources/specialprojects/birchbaywatershed-actionplan.jsp>